

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOHNNIE M. DuBOSE)
Plaintiff,) C.A. No.: 07-45***
v.)
MICHAEL WALSH, in his official capacity as)
New Castle County Sheriff; AMERICAN)
BUSINESS CREDIT (ABC); ROBERT K.)
BESTE, JR; and MAGGIE CLAUSELL, Esq.)
Defendants.)

MOTION TO JOIN AND MOTION TO DISMISS

COMES NOW, Defendant Maggie Clausell, Esquire, by and through her undersigned attorney, and Moves to Join in and Adopt the Motion to Dismiss and Opening Brief filed by Defendant Robert K. Beste, (D.I 9 and 10) and, further, respectfully moves this Honorable Court for an order dismissing this action against her, for the reasons more fully set forth in the Opening Brief filed herewith.

TIGHE & COTTRELL, P.A.

/s/ Paul Cottrell
Paul Cottrell, Esq. (DE I.D. # 2391)
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Dated: February 19, 2007

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FOR THE DISTRICT OF DELAWARE**

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MICHAEL WALSH, in his official capacity as)	
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)	
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CERTIFICATE OF SERVICE

I, Paul Cottrell, Esquire, hereby certify that on February 19, 2007, I caused to be served a true and correct copy of the attached *Motion to Join and Motion to Dismiss* upon the following in the manner indicated:

Electronic Mail using CM/ECF

Robert K. Beste, Jr.	Donald L. Gouge, Jr.
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First Class, US Mail, Postage Prepaid

Johnnie M. DuBose	American Business Credit, Inc.
4 Teakwood Lane	c/o George L. Miller, Chapter 7 Trustee
Wilmington, DE 19801	Miller Coffey Tate LLP
	8 Penn Center, Suite 950
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TIGHE & COTTRELL, P.A.

/s/ Paul Cottrell
Paul Cottrell, Esquire
DE I.D. # 2391